

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: KEVIN SCOTT KESECKER : CHAPTER 13
Debtor(s) :
 :
 :
 JACK N. ZAHAROPOULOS :
 STANDING CHAPTER 13 TRUSTEE :
 Movant :
 :
 :
 vs. :
 :
 :
 KEVIN SCOTT KESECKER :
 Respondent(s) : CASE NO. 1-21-bk-02438

TRUSTEE'S OBJECTION TO FOURTH AMENDED CHAPTER 13 PLAN
FILED ON DECEMBER 30, 2022

AND NOW, this 4th day of January, 2023, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:

- a. The plan is underfunded relative to claims to be paid – 100% plan. Needs about \$191,288.00 in order to be fully funded.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 4th day of January, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Nicholas Platt, Esquire
230 York Street
Hanover, PA 27331

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee